

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

NICOLE TAYLOR REED,

Plaintiff,

V.

BIG LOTS STORES, INC.,


Defendant.

CIVIL ACTION NO.

2:06-CV-00380-MHT-CSC

CERTIFICATION OF GOOD FAITH EFFORTS TO CONFER

Pursuant to FED. R. CIV. P. 37(a)(2)(B), I hereby certify that, prior to filing the foregoing Motion to Compel and supporting memorandum, I in good faith attempted to confer with Plaintiff regarding her failure to provide responses to Big Lots' First Set of Interrogatories and First Requests for Production. Specifically, I sent Plaintiff a letter via certified mail and Federal Express overnight delivery. As further discussed in the supporting memorandum, I also attempted to contact Plaintiff many times by telephone in efforts to schedule and conduct a good faith conference. The foregoing documents were filed on behalf of Big Lots only after my numerous efforts to obtain Plaintiff's delinquent discovery responses without Court action failed.


Gregory L. Smith, Jr.
Georgia Bar No. 658369